PB89-189542

Superfund Record of Decision (EPA Region 5)
NL/Taracorp/Golden Auto Parts Site, St. Louis Park
Minnesota (Second Remedial Action) September 1988

(U.S.) Environmental Protection Agency, Washington, DC

Sep 88

U.S. Department of Commerce
National Technical Information Service
NTIS

United States
Environmental Protection
Agency

Office of
Emergency and
Remedial Response

EPA/ROD/R05-88/077
September 1988

PB89-189542

EPA

Superfund Record of Decision:

NL/Taracorp/Golden Auto, MN

REPRODUCED BY
U.S. DEPARTMENT OF COMMERCE
NATIONAL TECHNICAL INFORMATION SERVICE
SPRINGFIELD, VA. 22161

50272-101

REPORT DOCUMENTATION PAGE	1. REPORT NO. EPA/ROD/R05-88/077	2.	3. Recipient's Accession No. PB89 189542/AS
4. Title and Subtitle SUPERFUND RECORD OF DECISION NL/Taracorp/Golden Auto Parts, MN Second Remedial Action - Final			5. Report Date 09/29/88 6.
7. Author(s)			8. Performing Organization Rept. No.
9. Performing Organization Name and Address			10. Project/Task/Work Unit No. 11. Contract(C) or Grant(G) No. (C) (G)
12. Sponsoring Organization Name and Address U.S. Environmental Protection Agency 401 M Street, S.W. Washington, D.C. 20460			13. Type of Report & Period Covered 800/000 14.

15. Supplementary Notes

16. Abstract (Limit: 200 words)

The NL/Taracorp/Golden Auto Parts site is located in St. Louis Park, Hennepin County, Minnesota. A secondary lead smelting facility operated onsite from 1940 until 1982. Land use adjacent to the site is light industry. There are residential areas within 0.25 mile of the site to the north, east, and west. Aquifers beneath the site serve as primary sources of drinking water in the area, supplying 90 percent of all ground water used in the region. The site was originally owned by NL Industries, Inc., but was later divided and each portion sold to a succession of owners. One of these owners, Taracorp, owned and operated the lead smelting facility from August 1979 until February 1981. Secondary lead smelting operations recovered lead from lead plates, battery fragments, and lead containers. The industrial operations and onsite waste disposal activities resulted in elevated lead levels in air and onsite soil. Under a Consent Order, NL conducted onsite investigations and cleanup activities between 1985 and 1988 including soil remediation, capping the site with asphalt, and establishing a long-term ground water monitoring program. As part of the Consent Order, NL was also required to investigate and, if necessary, clean up soil near the site possibly contaminated by windblown contaminants. This remedial action addresses the possibility of offsite soil contamination. Investigations indicate that offsite soil does not contain elevated

(See Attached Sheet)

17. Document Analysis a. Descriptors

Record of Decision
NL/Taracorp/Golden Auto Parts, MN
Second Remedial Action - Final
Contaminated Media: none
Key Contaminants: none

b. Identifiers/Open-Ended Terms

c. COSATI Field/Group

18. Availability Statement	19. Security Class (This Report) None	21. No. of Pages 30
	20. Security Class (This Page) None	22. Price

16. ABSTRACT (continued)

levels of lead attributable to the site. There are no contaminants of concern attributable to the site affecting the offsite soil.

The selected remedial action for this site is a no action remedy. The one residential yard that exceeds state and ATSDR guidance levels for soil lead is not clearly attributable to the site, but will be addressed through a cooperative cleanup by NL Industries. There is no capital cost or O&M associated with this remedial action.

ATTENTION

PORTIONS OF THIS REPORT ARE NOT FULLY LEGIBLE. DUE TO THE IMPORTANCE OF THE MATERIAL IT IS MADE AVAILABLE TO THE PUBLIC. HOWEVER, IT IS THE BEST REPRODUCTION AVAILABLE FROM THE COPY SENT TO NTIS.

DOCUMENT COMPLETE AS PAGINATED PER SOURCE.

DIRECT QUESTIONS RESULTING FROM ILLEGIBILITY TO:

U.S. EPA
OSWER - HSCD

RECORD OF DECISION

DECLARATION

Site Name and Location

NL/Taracorp/Golden Auto Parts Site
St. Louis Park, Minnesota

Statement of Basis and Purpose

This decision document presents the selected remedial action for the off-site soils portion of the NL/Taracorp/Golden Auto Parts (the Site), in St. Louis Park, Minnesota, developed in accordance with CERCLA, as amended by SARA, and, to the extent practicable, the National Contingency Plan. This decision is based on the administrative record for this Site. The attached index identifies the items that comprise the administrative record upon which the selection of the remedial action is based. The Minnesota Pollution Control Agency's decision is based in accordance with the Minnesota Statute 115B.

The State of Minnesota and U.S. EPA independently concur and adopt the selected remedy.

Description of the Selected Remedy

Based on the administrative record, U.S. EPA and the Minnesota Pollution Control Agency (MPCA) each have decided that no further action is necessary for the off-site soils near the NL Site.

This action is the final remedial action for the off-site soils portion of the Site. The on-site soils and ground water portions of the Site have been addressed by a Consent Order for Remedial Investigation/ Feasibility Study and remedial activities signed by NL Industries, the United States Environmental Protection Agency (U.S. EPA) and the Minnesota Pollution Control Agency (MPCA) in 1985. The Consent Order covered three areas of the Site:

1. On-site soils investigation, stabilization, and cleanup;

2. Ground water investigation and long-term ground water monitoring; and

3. An off-site soils remedial investigation, and if necessary, a feasibility study for remedial action.

The on-site investigation, stabilization, and cleanup activities were completed with capping of the Site in June, 1988. Based on the ground water investigation, a 30-year long-term ground water monitoring program was established in November, 1987. This Record of Decision documents the U.S. EPA's decision and the MPCA's decision for the off-site soils portion of the Site.

Declaration by U.S. EPA

The selected remedy is protective of human health and the environment, attains Federal and State requirements that are applicable or relevant and appropriate for this remedial action, and is cost-effective. This remedy utilizes permanent solutions and alternative or resource recovery technologies to the maximum extent practicable for the off-site soils portion of the NL Site. The statutory preference for treatment is not applicable to this no action remedy. Neither treatment nor any other type of remedy is necessary for the off-site soils in order to protect human health and the environment.

for Francis Covington

Valdas V. Adamkus
Regional Administrator
U.S. EPA, Region V

9/29/85
Date

Declaration by MPCA

The selected remedy is protective of human health and the environment, attains Federal and State requirements that are applicable or relevant and appropriate for this remedial action, and is cost-effective. This remedy utilizes permanent solutions and alternative or resource recovery technologies to the maximum extent practicable for the off-site soils portion of the NL Site. The statutory preference for treatment is not applicable to this no action remedy. Neither treatment nor any other type of remedy is necessary for the off-site soils in order to protect human health and the environment.

Gerald L. Willet

Gerald L. Willet
Commissioner
Minnesota Pollution Control Agency

September 23, 1988
Date

RECORD OF DECISION SUMMARY

I. Site Name, Location, and Description

The NL/Taracorp/Golden Auto Parts Site was the location of a secondary lead smelter from 1940 to 1982. As shown in Figure 1, the Site is located in Hennepin County, Minnesota, in the City of St. Louis Park. The Site consists of contiguous properties, one portion which was formerly owned by NL Industries and Taracorp, Inc. at 3645 Hampshire Avenue South and the other portion which is owned by Morris and Harry Golden at 7003 West Lake Street. The Goldens now own both of these properties. Figure 2 presents the location of the properties constituting the Site.

Originally owned by NL Industries, Inc., the lead smelting facility was sold to Taracorp in August 1979. Taracorp ceased operation of the smelter in February 1981. NL sold the Golden area to Republic Enterprises, Inc. in 1962, who in turn sold this four and one-half acre parcel to Morris and Harry Golden. As previously mentioned, the Goldens now also own the Taracorp area of the site. The Goldens leased the Golden area to Golden Auto Parts Co., Inc., who operated an automobile wrecking and used automobile parts concern from 1964 to January 1983. Quality Auto Body, Inc. currently leases the Golden area from the Goldens. They are engaged in an automobile wrecking and used automobile parts business on the Golden area.

The land use adjacent to the Site is light industry. Residential areas are within 1/4 mile of the Site on the north, east, and western sides. The prominent wind direction is from west-northwest towards east-southeast. Minnehaha Creek is about one-half mile to the south and the Mississippi River is approximately six miles northwest of the Site. The Site is not in a floodplain.

Soils in the area consist of fine sands to course gravel, separated by glacial till. The depth of the surface drift varies from about 30 to 100 feet and is underlain by five bedrock aquifers. The uppermost aquifer (the Platteville) is located at about 90 to 100 feet, with the St. Peter aquifer located just below (about 100 to 200 feet). The St. Peter formation is underlain by the Prairie du Chien-Jordan group (380 feet), the Ironton-Galesville aquifer (700 feet) and the Mt. Simon-Hinkley aquifer (1,000 feet). The Prairie du Chien-Jordan and the Mt. Simon-Hinkley aquifers are the primary sources of drinking water in the area, supplying 90% of all ground water used in the region.

II. Site History and Enforcement Activities

A secondary lead smelter was operated at the site location from 1940 until 1982. The secondary lead smelting operations recovered lead from lead plates, battery fragments, and lead containers. A blast furnace was used until 1960, when it was replaced with a reverberatory smelting furnace.

FIGURE 1

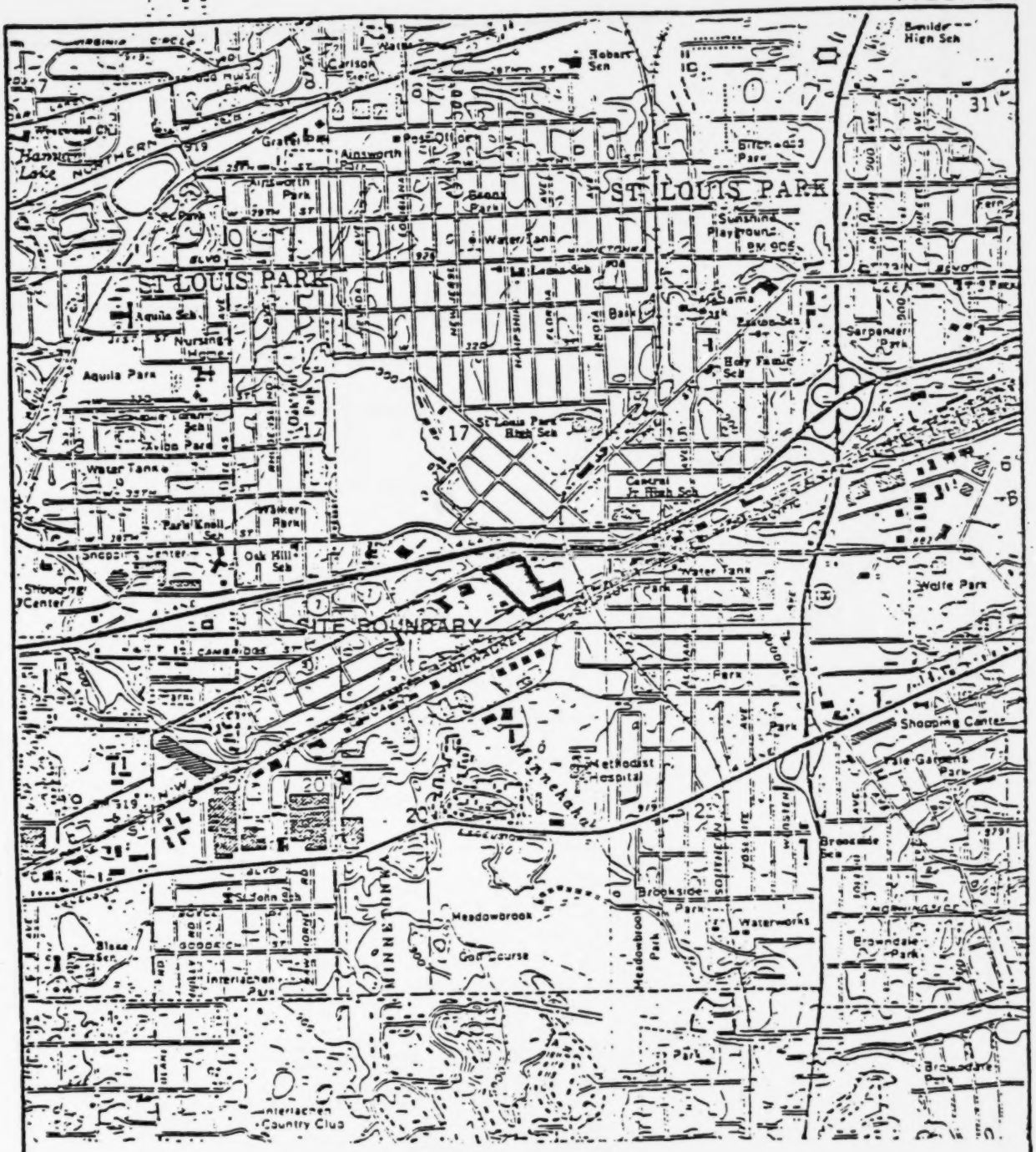
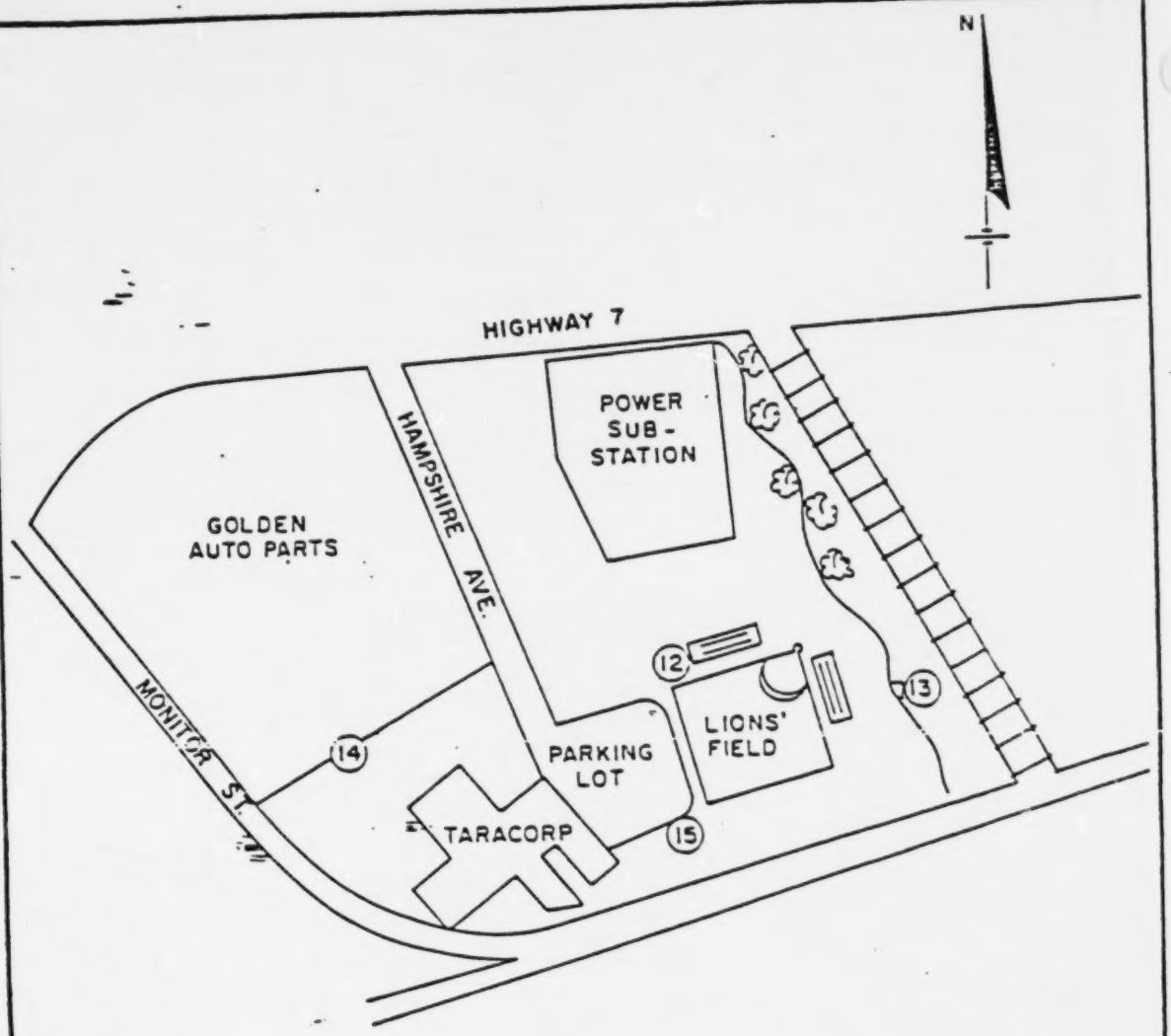

ST. LOUIS PARK
ST. LOUIS PARK
SITE BOUNDARY
Methodist Hospital
Water Tank
Water Tank
Golf Course
Meadowbrook
Brookside Park
Waterworks
Aquila Park
Aquila Sch
Oak Hill Sch
Park Knoll Sch
Walker Park
Wolfe Park
Sherpener Park
Brookside Sch
Shopping Center
Shopping Center
Interlachen Country Club
Interlachen Park
Hamm Lake
Ainsworth Park
Beard Park
Sunshine Playground
Robert Sch
Boulder High Sch
Lenox Sch
Casual Jr. High Sch
St. Louis Park High Sch
Holy Family Sch
Bank
Post Office
Nursing Home
Park
Blake Sch
St. John Sch
Minnehaha Creek
Minnehaha Creek
Meadowbrook
Park
Park
Park

FIGURE 2



NL/TARACORP/GOLDEN AUTO PARTS
ST. LOUIS PARK, MINNESOTA

SITE MAP

NOTE: BASE FIGURE FROM ARNESON, 1981

APPROX. SCALE: 1" = 150'

O'BRIEN & GERE ENGINEERS INC

Industrial operations and on-site waste disposal activities conducted from 1940 until 1982 resulted in elevated lead levels in air and on-site soils and were suspected of causing elevated lead levels in on-site ground water and off-site soils. The Site was placed on the National Priorities List of Superfund sites in September 1983. The MPCA issued a Request For Response Action to NL, Taracorp, and Golden Auto Parts in January 1984. In 1985, NL voluntarily entered into an Administrative Order and Response Order by Consent (Consent Order) with the MPCA and U.S. EPA, in accordance with the Minnesota Environmental Response and Liability Act (MERLA) and the Federal Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The Consent Order called for the design and implementation of the following activities:

1. On-site soils investigation, stabilization, and cleanup;

2. On-site ground water investigation and long-term ground water monitoring program; and

3. An off-site soil remedial investigation, and if necessary, a feasibility study to evaluate remedial alternatives.

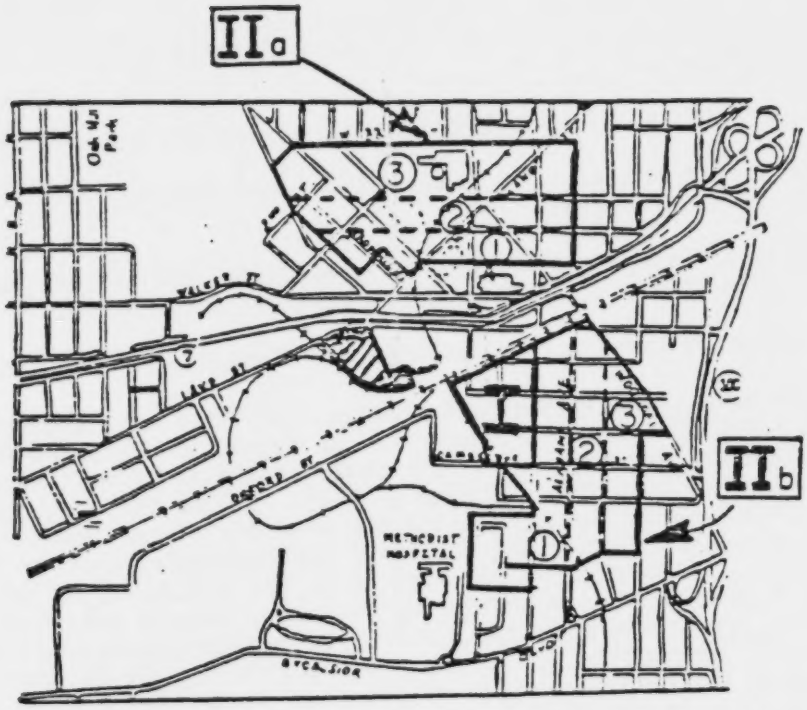
NL conducted these activities with oversight by MPCA and U.S. EPA.

The on-site investigation and cleanup activities were conducted between 1985 and 1988. Except for ongoing and future long-term operation, maintenance, and monitoring, NL completed the final onsite remedial activity, capping the Site with asphalt, in June 1988. NL investigated the ground water quality beneath the Site for site-related contaminants. Significant levels of such contaminants were not detected. In November 1987, MPCA, U.S. EPA and NL agreed to a 30-year long-term ground water monitoring program to ensure the ground water quality on-site remains acceptable. NL is required by the Consent Order to take action if, in the future, site-related contaminants are detected in the ground water in excess of prescribed levels set forth in the Consent Order. The on-site activities and long-term ground water monitoring program are not a subject of this Record of Decision.

As part of the Consent Order, NL was also required to investigate the surface soils near the Site, and if necessary, prepare a Response Action Plan to conduct Response Actions for contaminated surface soils. The Consent Order prescribed that NL would conduct a phased investigation. The first phase involved soil sampling in the nearest prominent down wind residential area defined as Zone I (see Figure 3) and included sampling along nearby highways and in public property areas. If soil lead levels were greater than 750 parts per million (ppm) for any residence on the outer (east) edge of Zone I, NL would be required to conduct Phase 2 of the soil sampling in Zone II (see Figure 3). In addition, NL would be required to conduct a Feasibility Study to examine cleanup options if the Zone I and/or Zone II soils were equal to or greater than 750 ppm and clearly attributable to the

FIGURE 3

OFF-SITE SOILS INVESTIGATION AREA



I Zone I Investigation Area - Exhibit B (Section V)

IIa, IIb Zone II Investigation Areas- Exhibit B (Section V)

① Tier 1
② Tier 2
③ Tier 3

Approximate Site Location

Reproduced from best available copy.

secondary lead smelter. NL completed the Phase I off-site soils investigation in 1987.

III. Community Relations History

A newspaper notice was published on or before September 1, 1988 notifying potentially affected persons and the public of U.S. EPA's preferred alternative for the off-site soils with a brief analysis of the Proposed Plan for no action. A reasonable opportunity to comment and provide information regarding the Proposed Plan was established from September 1 through September 21, 1988.

A public meeting was held on September 8, 1988 in St. Louis Park in accordance with Section 117(a)(2) of CERCLA.

A response to each of the significant comments, criticisms, and new data submitted in written or oral presentations is presented in the Responsiveness Summary portion of this ROD. This ROD contains a statement of the basis and purpose of the selected action.

IV. Scope and Role of Remedial Action

The scope of the problem addressed by this remedial action is the off-site soils portion of the Site. The investigation of off-site soils was conducted to determine if they represented a potential principal threat at the Site. However, sampling data indicates that the Site has not caused elevated soil lead levels in the Zone I area. This ROD formalizes the U.S. EPA's decision and the MPCA's decision to take no further action for the off-site soils.

Under the terms of the existing Consent Order, NL is required to provide long-term maintenance of the on-site cap and conduct long-term ground water monitoring. These two aspects of the Site are not a part of this ROD.

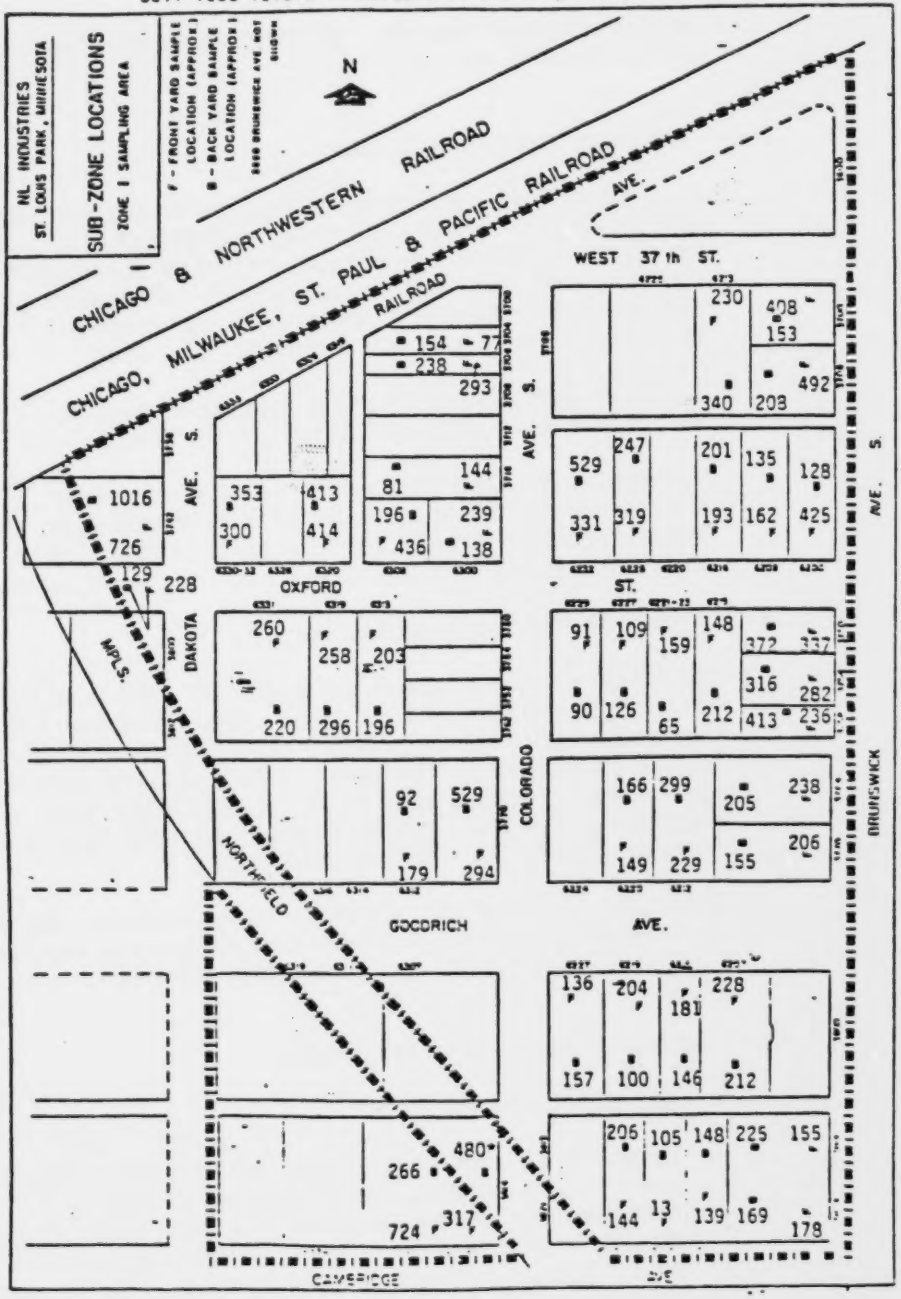
V. Summary of Site Characteristics

A. Off-site Soil Sampling

Ninety soil samples were collected from Zone I front and back yards. The results are presented in Figure 4. Only one sample exceeded the target level of 750 ppm, and the remainder of the data do not show the deposition gradient expected if the Site was a major source of lead in Zone I soils. More importantly, lead levels in Zone I soils are not clearly attributable to the Site because soil lead concentrations in Zone I are comparable to those found outside the influence of the Site as described in Part B (below). The one yard sample which exceeded the 750 ppm target level is not located on the outer edge (east edge) of Zone I,

Reproduced from best available copy.

Soil lead levels in concentrations of parts per million FIGURE 2


NL INDUSTRIES
ST. LOUIS PARK, MINNESOTA
SUB-ZONE LOCATIONS
ZONE I SAMPLING AREA
F - FRONT YARD SAMPLE LOCATION (APPROX.)
B - BACK YARD SAMPLE LOCATION (APPROX.)
3850 BRUNSWICK AVE. NOT SHOWN
N
CHICAGO & NORTHWESTERN RAILROAD
CHICAGO, MILWAUKEE, ST. PAUL & PACIFIC RAILROAD
WEST 37th ST.
AVE. S.
OXFORD ST.
DAKOTA
COLORADO
BRUNSWICK AVE. S.
GOODRICH AVE.
CAMBRIDGE
NORTHFIELD
MPLS.
1016 726 129 228
353 300 413 414
154 77 238 293 81 144 196 436 239 138
230 340 408 153 208 492
529 331 247 319 201 193 135 162 128 425
260 220 258 296 203 196
91 90 109 126 159 65 148 212 372 337 316 282 413 236
92 179 529 294
166 149 299 229 205 155 238 206
136 157 204 100 181 146 228 212
480* 266 724 317
205 144 105 13 148 139 225 169 155 178

*Yard resampled by MPCA, 430 ppm is correct value

**Values for 3850 Brunswick not shown, F=184 and B=155

which, in accordance with the Consent Order, is a prerequisite to conducting a Phase 2 investigation. The following table is a summary of the NL off-site soil sampling results:

Location	Detection Frequency	Concentration, mg/kg (dry weight) Range	Average
Zone I	90/90	<13 - 1016	246
Public properties	7/7	29 - 251	132
Oak Hill Park (background)	8/8	19 - 68	43

B. MPCA Soil Lead Study

MPCA conducted a statewide soil lead study in 1986 and 1987. The Minneapolis metropolitan area was a major focus of the soil lead study. MPCA collected hundreds of soil samples from residential areas in Minneapolis. The following table summarizes the results of the State's soil lead sampling in the Minneapolis area:

# OF SAMPLES	SAMPLE TYPE	MEDIAN	MEAN
28	Garden	264	535
119	Back Yard	223	275
199	Foundation	689	1393
131	Front Yard	185	225
51	Open	35	87
139	Play Area	33	85
170	Street Side	165	235
61	Side Yard	247	350

Based on a review of the NL Zone I soil lead results and its own state soil lead study results, MPCA asserts that the Zone I lead levels are comparable to soil lead levels in areas of Minneapolis not affected by the NL Site.

VI. Summary of Site Risks

A. U.S. EPA Endangerment Assessment

As part of its off-site Soils Report, NL characterized what it believes to be the public health and environmental impacts of the soil lead levels found in the off-site areas (see B.1. below). Based on the Zone I sampling results, NL recommended to MPCA and

U.S. EPA that no additional sampling or cleanup activities is necessary for the off-site soils.

Before accepting NL's recommendation, U.S. EPA developed its own risk assessment for the off-site soils in Zone I. U.S. EPA conducted its own risk assessment (called an Endangerment Assessment), because a risk assessment methodology for estimating public health impacts of contamination was developed after the NL Consent Order was signed, and therefore, the most recent methodology was not employed by NL. U.S. EPA conducted the NL Off-site Soil Endangerment Assessment in accordance with the Superfund Public Health Evaluation Manual, October 1986.

The following is a summary of the results of U.S. EPA's Endangerment Assessment:

° Lead is the chemical of concern

° The exposure assessment focused on children under six years of age and pregnant women. Ingestion of soil is likely to be the significant exposure route. Dermal contact and inhalation of soil are possible exposure routes. Exposure rates via soil ingestion, inhalation, and dermal contact were estimated for children under six and pregnant women for the average Zone I soil lead level and the worst case (maximum) Zone I soil level. The Endangerment Assessment explains the assumptions used to estimate exposure.

° Toxicity evaluation - Lead is a heavy metal that produces a number of adverse health affects in humans. The primary health concern centers around chronic low-level exposure. This is because lead is strongly retained in humans and lead toxicity is cumulative. One of the most characteristic effects of chronic lead exposure is hypochromic, microcytic anemia, stemming from lead-induced inhibition of hemebiosynthesis and a decrease in erythrocyte life-span. Another characteristic of chronic lead exposure is impairment of the nervous system. Many studies have shown that animals and humans are most sensitive to this effect during the time of nervous system development. Thus, the fetus, infants and young children are particularly vulnerable. Symptoms of nervous system damage range from subtle decreases in intelligence and neurological tests to frank encephalopathy. Recent studies show a correlation between blood pressure and the level of lead in blood, which may increase the risk of stroke or heart attack. There is only limited evidence that lead causes cancer in humans and the non-cancerous effects on the nervous system and on hematopoiesis are usually considered to be the most important and sensitive endpoints of lead toxicity. Considerable uncertainty exists as to what degree of lead exposure, if any, can be considered safe. Subtle signs of lead-induced effects

begin to be apparent at around 10 micrograms lead/deciliter of blood (ug/dL) or even lower, with effects becoming clearer by 40 mg/dL and reaching clinical significance by 80 to 100 mg/dL. Of special concern is the claim by several researchers that some of the effects of lead do not have a threshold value.

- Risk characterization - The estimated exposure level for children under six and pregnant women is considered safe for the Zone I average soil concentration and for pregnant women in the worst case (maximum level). A public health threat may exist for children under six for the worst case (maximum) Zone I soil lead level.

- Although the worst case (maximum) soil lead value is not in and of itself clearly attributable to the Site, MPCA has arranged to address the elevated lead level in the one back yard, through a cooperative cleanup effort outside of the scope of the Consent Order by NL Industries.

B. Other Risk Information

1. Off-site Soils Report

NL concluded in its Off-site Soils Report that the average Zone I soil lead level does not present a public health threat if ingested. NL concluded that the maximum soil lead level (1,016 ppm) also does not present a public health threat, if ingested. NL based its opinion on comparing calculated blood level increases due to ingesting certain amounts of soil containing certain amounts of lead. The methodology is based on a study by Stark et. al. (1982). NL also pointed out that ingestion of, and therefore exposure to, the lead in the Zone I soils is not likely to occur since the soils are covered by an established vegetative cover.

2. Minnesota Interim Soil Lead Standard

The Minnesota Interim Soil Lead Standard of 1000 ppm was exceeded in only one back yard. Based on the data collected, the elevated lead level in this yard is not clearly attributable to the Site.

3. ATSDR Soil Lead Guideline

ATSDR reviewed the NL off-site soils data and concluded that because the levels did not exceed the 500-1000 ppm ATSDR soil lead guideline (except in one case not clearly attributable to the Site), the Zone I soil lead levels do not present an imminent public health threat.

VII. Description of Alternatives and Comparative Analysis

Based on the sampling results and the U.S. EPA Endangerment Assessment, action of any type is not necessary for the off-site soils near the NL Site. Therefore, alternatives were not developed, evaluated or compared. No action for the off-site soils was the only remedial alternative examined.

VIII. Selected Remedy

Based on:

1. Sampling results which do not indicate a clear pattern of aerial deposition of lead from the Site;

2. Extensive MPCA soil lead data indicating Zone I soil lead levels are comparable to those in areas of Minneapolis not affected by the Site;

3. The fact that only one back yard not clearly attributable to the Site exceeded the State of Minnesota interim soil lead standard and the ATSDR soil lead guidance; and

4. U.S. EPA's Endangerment Assessment which showed the average Zone I soil lead level does not present a public health threat,

U.S. EPA and MPCA each have determined that no further action for the off-site soils is protective of human health and the environment, attains ARARs, and is cost effective.

IX. Statutory Determinations

A. Protection of Human Health and the Environment: Based on the results of the U.S. EPA Endangerment Assessment, no action for the off-site soils is protective of human health and the environment.

B. Attainment of ARARs: No action attains the State ARAR of 1000 ppm for soil lead. In addition, the ATSDR guidance level of 500-1000 ppm (to be considered) is also attained. The one yard which exceeds these levels is not clearly attributable to the Site. However, MPCA has arranged to address this elevated lead level through a cooperative cleanup by NL Industries.

C. Cost-effectiveness: The no action remedy is cost effective.

D. Utilization of Permanent Solutions and Alternative Treatment Technologies or Resource Recovery to the Maximum Extent Practicable: Based on the available information in the administrative record, the no action remedy was determined to be the best solution for the Site. The no action remedy represents

the maximum extent to which permanent solutions can be practicably utilized for the off-site soils near the Site.

E. Preference for Treatment as Principal Element: The statutory preference for treatment is not applicable to this no action remedy. Neither treatment nor any other type of remedy is necessary for off-site soils in order to protect human health and the environment.

RESPONSIVENESS SUMMARY

U.S. EPA and MPCA did not receive any written public comments on the NL Off-site Soils Proposed Plan. The Agencies did, however, respond to several concerns raised by the home owner with the one yard with soil lead levels greater than 1000 ppm at the public meeting held on September 8, 1988. Those concerns and responses are summarized below:

Comment:

The home owner raised several concerns about the effects the elevated soil lead level in their yard may have on their or their childrens health, and what would be done about their problem. They were especially concerned because it has been a long time since they learned of the problem in their back yard.

Response:

The Agencies responded that they understood the home owner's concern, and therefore, had taken several steps to address the elevated lead levels in their yard. The home owner was informed of the elevated lead level in their back yard when the results were available. They were also advised of the precautions they should take to limit potential exposure to the lead. Such precautions included making sure their children did not play in the area, keeping their house free of dust, and making sure their children washed their hands before eating. Mark Schmitt from MPCA confirmed that parental supervision of children and awareness of the problems with lead may be the most important and effective ways to prevent lead exposure.

The Agencies and NL Industries also confirmed that the home owner's back yard would be addressed by NL Industries. NL agreed to bring in two inches of clean soil and resod the back yard.

Comment:

The home owner asked why it had taken so long to address their soil lead problem in particular, and the off-site soils in general, when the Order had been signed in 1985.

Response:

The Agencies explained that although the Order was signed in 1985, the results of the off-site soil sampling were not available until 1987. At the time the results were available the home owner was informed of the elevated lead level in their back yard and advised of precautions they should take.

The Agencies explained that the U.S. EPA Endangerment Assessment could not be conducted until after the results were available. The Agencies stated that although they recognize the process is slow, the time line for the project was not out of line with other Superfund projects.

Public Meeting Transcript

The transcript of the public meeting is in the Administrative Record for the Site and contains the complete presentation by the Agencies and subsequent discussions between the Agencies and community members.

1/1/85

page no. 1
01/01/85

MICROFICHE RELOAD INDEX
NL Industries
Minnesota

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE
	3	82/03/12	Letter from MPCA to Linquist & Vennum concerning 2/24/82 meeting	D.L.Wikre-MPCA	R.Sheran-Attorney	Correspondence
	3	82/03/18	Response by Taracorp & NL to MPCA's 2/24/82 letter	S.Sabel&W.P.Bronner-NL	D.Day-MPCA	Correspondence
	6	82/04/13	Response by MPCA to 3/18/82 letter from NL and Taracorp	D.Day-MPCA	Bronner,Sheran&Sabe l-NL	Correspondence
	6	82/09/15	MPCA response to NL and Taracorps 3/22/82 letter	Ingvig MPCA	Bronner and Sobel-NL	Correspondence
	3	83/01/17	Detail of questions and actions necessary to assess lead disposal site impacts	Day-MPCA Site Response Unit	Sheran,Weddendorf&W entz	Correspondence
	6	83/06/02	Conclusions to information provided by various parties	Day-MPCA	Wedd,Weddendorf&She ran	Correspondence
	4	83/06/30	Letter from NL to MPCA concerning slag	Weddendorf-NL	Day-MPCA	Correspondence
	5	83/09/12	SEPCO's analysis results of 8/1/83 groundwater sampling	D.N.Day-MPCA	R.Sheran-Lindquist& Vennum	Correspondence
	15	84/01/10	Request for response actions	Jaspen-MPCA	NL,Taracorp,Golden Auto	Correspondence
	1	85/05/15	Requirements for disposal of demolition waste	Convery-MPCA	Weddendorf-NL	Correspondence
	17	85/08/23	Revisions to subsurface structure investigation	Weddendorf-NL	Gardner-OR; Materials	Correspondence
	3	85/11/08	Review of documents by EPA	Gould-USPEA	Weddendorf-NL	Correspondence

Reproduced from best available copy.

Administrative Record Index
NL Industries
Minnesota

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE
	2	85/11/25	Concerns on pending demolition	[illegible]	Wendenburg/Kirkpatrick per	Correspondence
	1	86/01/09	Reports on demolition of NL Site	Wallner-MPCA	Soule-USEPA	Correspondence
	1	86/01/29	Review of off-site soils RIWP	Soule-USEPA	Wendenburg	Correspondence
	4	86/03/12	Comments on response measures	Soule-USEPA	Wendenburg	Correspondence
	24	86/05/09	Bi-monthly progress report	Doherty-NL	MPCA and USEPA	Correspondence
	2	86/05/21	Review comments on Appendix I of RI/FS	Soule-USEPA	Doherty-NL	Correspondence
	4	86/06/10	Negotiation on final plan and program for above-ground response measures	Soule-USEPA	Doherty-NL	Correspondence
	7	86/09/08	Agreement on off-site soil sampling	Doherty-NL	USEPA and MPCA	Correspondence
	2	86/12/24	Explanation of paving and grading delay	Doherty-NL	Wallner-MPCA	Correspondence
	1	87/01/26	Concern over data delay	Soule-USEPA	Doherty-NL	Correspondence
	1	87/05/18	Fulfillment of Task I of Sec.VI, Exhibit A of Order-Approval	Soule-USEPA	Doherty-NL	Correspondence
	2	87/05/28	Letter from MPCA to P&R's concerning paving activities	Wallner-MPCA	NL,StLouis Park&Rosen	Correspondence
	2	87/09/03	Letter discussing StLouis Park's Planning Commission meeting of 8/19/87 and its discussion of NL's application for a special permit	MPCA	StLouis Pk City Council	Correspondence
	1	87/09/04	Confirmation of phone conversation relating	Dicia-USEPA Rem.Proj.Mgr.	Doherty-NL	Correspondence

Page No. 3
of 01/89

[illegible] RECORD INDEX
NL Industries
Minnesota

FILM/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE
			term groundwater monitoring program			
	9	87/09/22	Various correspondence regarding NL's request for a special permit			Correspondence
	3	87/10/01	Comments on hydrogeologic setting	Delaney-Barr Engineering Co.	[illegible]	Correspondence
	6	87/10/07	Update on grading and paving activities	Doherty-NL	Thompson-MPCA	Correspondence
	4	87/10/08	Update on long-term groundwater monitoring program	Doherty-NL	MPCA and USEPA	Correspondence
	2	87/11/03	Confirmation of meeting on long-term groundwater monitoring program	Doherty-NL	MPCA and USEPA	Correspondence
	1	87/11/16	Response to request for information re the resident with elevated lead levels	Wallner-MPCA	Doherty-NL	Correspondence
	7	87/11/17	Amendments to existing OAEO and the sign-offs approving of the amendments	Gioia-USEPA	MPCA, NL/Barr Engineering	Correspondence
	2	87/11/20	Notice of intent to conduct the first round of the long term groundwater monitoring	Doherty-NL	MPCA and USEPA	Correspondence
	1	87/12/08	Transmittal of Dec 04 [illegible] Plan	Maloney, Barr Engineering	T.Gioia, USEPA	Correspondence
	1	88/03/28	Transmittal of Semi-Annual Report	Maloney, Barr Engineering	USEPA and MPCA	Correspondence
	4	88/09/01	Off-site Soils Fact Sheet	USEPA	Community members	Fact Sheet
	1	88/08/17	AFSDR Review of NL Off-site Soils Data on EA	D. Jordan-Izaguirre, AFSDR	Gioia, USEPA	Memorandum
	1	88/08/17	Air Division Review of NL Off-site Soils Data	T. Gioia, USEPA	File	Memorandum

ADMINISTRATIVE RECORD INDEX
NL Industries
Minnesota

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE
	4	00/00/00	Chronology of site with test summaries	MPCA		Other
	9	84/07/30	Public Notice on Lead	Engelmann-USEPA		Other
	46	83/10/05	Petition before the MPCA to declare uses of real estate w/exhibit (Third Amended Complaint)	Harry Golden		Pleadings/Orders
	52	84/08/20	Administrative Order and Response Order by Consent	NL, MPCA and EPA		Pleadings/Orders
	35	85/03/08	Administrative Order and Response Order by Consent			Pleadings/Orders
	2	85/01/22	News Release EPA seeks public comment	J.Peltz-USEPA Community Relations		Press Release
	9	00/00/00	Endangerment Assessment			Reports/Studies
	3	00/00/00	Report of : "Children's Exposure to Smelter Associated Lead, Montana & Idaho"	Center for Disease Control		Reports/Studies
	148	00/00/00	Bi-monthly progress reports for period of 5//85 to 9/4/8/	Doherty-NL Industries	MPCA and USEPA	Reports/Studies
	64	00/00/00	Alternate month reports for 6/19/85 to 10/02/87	Doherty-NL Industries	MPCA and USEPA	Reports/Studies
	5	00/00/00	Corrected Table 1 and 2 of off-site soils report	O'Brien & Gere		Reports/Studies
	100	00/00/00	Statement of Work for Inorganic Analysis	Rocky Mt. Analytical Lab-Eneco		Reports/Studies
	40	78/04/00	"Preventing Lead Poisoning in Young Children"	Center for Disease Control-Atlanta		Reports/Studies
	10	86/05/27	Specifications for soil sampling & ground water monitoring wells for Taracorp site	Subterrenean, Inc. for Taracorp		Reports/Studies

Reproduced from best available copy.

Page No. 5
01/01/80

ADMINISTRATIVE RECORD INDEX
NL Industries
Minnesota

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE
	13	82/07/02	Proposed subsurface investigation for Golden Auto Parts site	Mechnagel-Soil Exploration Co.	MPCA	Reports/Studies
	51	82/07/14	Phase I Assessment Program	Weste-Paracorp/Weddendorf-NL	Thorvig-MPCA	Reports/Studies
	16	82/08/16	Site Inspection	L.Day-USEPA		Reports/Studies
	49	82/10/26	Phase II Site Investigation Golden Auto Parts Site Study	Mechnagel-Soil Exploration Co.	Golden Auto Parts	Reports/Studies
	52	83/04/00	"Study of Lead Pollution in Granite City, Madison, and Venice, IL"	Illinois EPA		Reports/Studies
	21	83/08/24	Field Sampling and Chemical Analysis-Golden Auto Parts	Mechnagel-Soil Exploration Co.	Golden Auto Parts	Reports/St
	23	84/02/09	RI/FS Statement of Work	Sieder-West.Atty.Gen.of IL	Bronner-NL	Reports/Studies
	85	84/08/00	Draft GW-flow model of the Prairie du Chien Jordan Aquifer	US Dept. of Interior	MPCA	Reports/Studies
	11	85/02/26	Agenda item control sheet	MPCA-Site Response Section		Reports/Studies
	185	85/04/00	Program for response measures	Weddendorf&Baser-NL		Reports/Studies
	37	85/04/00	Program for above ground response measures	Weddendorf&Baser-NL		Reports/Studies
	88	85/06/00	Area Evaluation Report	Hale-O'Brien&Gere		Reports/Studies
	44	85/06/22	Response measures plan Subsurface structure sampling	OH Materials Co of MN	NL Industries	Reports/Studies
	list	85/07/00	Off-Site Soils Removal Investigation	F.Hale-O'Brien&Gere	MPCA and USEPA	Reports/Studies
	39	85/07/02	Subsurface structure investigation	Gardner-OH Materials	NL Industries	Reports/Stu
	15	85/09/30	Monthly Reports of Mainland Land and Equip-	Weddendorf-NL	MPCA and USEPA	Reports/Studies

Page No. 6
01/01/80

NUMUS (Archive RECORD INFO)
NL Industries
Minnesota

FILM#/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE
			ment June,July&August 1985			
	71	86/02/00	QA/QC Control plan	O'Brien&Gere		Reports/Studies
	2	86/04/17	Responses to comments on QA/QC	Wiseman-QH Materials	Gould-USEPA	Reports/Studies
	56	86/07/00	Quality Assurance Project Plan (QAPP)	QH Materials		Reports/Studies
	61	86/07/01	QA/QC for above ground response measures	Doherty-NL	MPCA and USEPA	Reports/Studies
	71	87/01/20	Final Report for G.W. Sampling/Analysis with QA/QC Control Plan	Wiseman-QH Materials		Reports/Studies
	6	87/02/16	Addendum report to summary of ground water flow pattern around St.Louis Park and transmittal letter	Doherty-NL	USEPA and MPCA	Reports/Studies
	160	87/04/00	Phase I Remedial Investigation Report--Off-Site Soils Remedial Investigation	O'Brien&Gere		Reports/Studies
	166	87/06/00	Soil Lead Report to the Minnesota State Legislature	MPCA and MDH		Reports/Studies
	6	87/06/05	Letter re:Summary of lead concentrations for off-site soil samples	O'Brien&Gere	Doherty-NL	Reports/Studies
	2	87/11/05	Monthly Report for October,1987	Doherty-NL	MPCA and USEPA	Reports/Studies
	2	87/12/09	Monthly report for November,1987	Doherty-NL	MPCA and USEPA	Reports/Studies
	2	88/01/06	Monthly Report for December,1987	Doherty-NL	MPCA and USEPA	Reports/Studies
	150	88/03/00	Semi-Annual Report July-Dec. 1987	Barr Engineering	NL Industries	Reports/Studies
	24	88/05/02	Supplement to Soil Lead Report to the Minnesota	MDH		Reports/Studies

ADMINISTRATIVE RECORD INDEX
NL Industries
Minnesota

FICHE/FRAME	PAGES	DATE	TITLE	AUTHOR	RECIPIENT	DOCUMENT TYPE
			Legislature (June 87)			
		88/08/31	Final Draft NL Endangerment Assessment	Jacobs Engineering Group	USEPA	Reports/Studies
	6	88/09/01	Off-site Proposed Plan	USEPA		Reports/Studies
	2	00/00/00	Summary of lead,cadmium, arsenic,sulfate&PH analysis			Sampling/Data
	6	86/10/30	Summary of Phase I off-site soils sampling activity	O'Brien&Gere	Doherty-NL	Sampling/Data
	1	87/05/07	MDH Off-site soil sampling results	MDH		Sampling/Data

ADDITIONS TO NL INDUSTRIES RECORD
Post Public Comment Period
September 23, 1988

Date	Title	Author	Recipient	Document Type
9/8/88	Public Meeting Transcript	McCauley & Associates	U.S. EPA MPCA	Transcript
8/29/88	Press Release	MPCA	N/A	Press Release
8/29/88	Newspaper Notice	U.S. EPA	St. Louis Sailor	Newspaper Notice
9/8/88	Responsiveness Summary	U.S. EPA	Public	Insert in ROD